



R05-21-A-045

CITY OF MANITOWOC

WISCONSIN, USA

www.manitowoc.org



Per grant application requirements, the following identifies the applicant and contact for communication with USEPA:

1. Applicant Identification

- a. Name of Applicant: Community Development Authority of the City of Manitowoc
- b. Address of Applicant: 900 Quay Street; Manitowoc, WI 54220

2. Funding Requested

- a. Assessment Grant Type: Site-Specific
- b. Federal Funds Requested:
 - i. Requested Amount: \$200,000
 - ii. Waiver Request: No

3. Location

- a. City: City of Manitowoc
- b. County: Manitowoc County
- c. State: State of Wisconsin

4. Property Information for Site-Specific Proposals

- a. Property Name: River Point District
- b. Property Address: North 11th Street and Chicago Street; Manitowoc, Wisconsin

5. Contacts

- a. Project Director - Community Development Authority of the City of Manitowoc:

Project Director	Highest Ranking Elected CDA Official
Adam Tegen Executive Director (920) 686-6931 ategen@manitowoc.org 900 Quay Street Manitowoc, WI 54220	John Stangel Chair of CDA Board of Commissioners (920) 682-4644 jstangel@salutzlaw.com 823 Marshall St, PO Box 187 Manitowoc, WI 54221

- b. Chief Executive/Highest Ranking Elected City Official
Name: Justin Nickels, Mayor of the City of Manitowoc
Phone: (920) 686-6980
Email address: jnickels@manitowoc.org
Mailing Address: 900 Quay Street; Manitowoc, WI 54220

6. General population (2018 US Census Bureau Estimate)

- a. Target Census Tract (CT 4) = 3,843
- b. City of Manitowoc = 32,798

7. Other Factors Checklist

Other Factors	Page #(s)
Community population is 10,000 or less.	Yes, P.4
Applicant is, or will assist, a federally recognized Indian tribe or U.S territory.	N/A
The priority brownfield site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Yes, P.1
The priority brownfield site(s) is in a federally designated flood plain.	Yes, P.1
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	Yes, P.2
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	Planning is complete (P.2)

8. Letter from the State Environmental Authority

- a. See attached letter from the Wisconsin Department of Natural Resources



October 22, 2020

Adam Tegen
Community Development Director
Community Development Authority of the City of Manitowoc
900 Quay Street
Manitowoc, Wisconsin 54220

Subject: State Acknowledgement Letter for the Community Development Authority of the City of Manitowoc

FY21 EPA Site-specific Assessment Grant

Dear Mr. Tegen:

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of the Community Development Authority (CDA) of the City of Manitowoc for U.S. Environmental Protection Agency Brownfield Grant funds identified above.

The DNR is fully committed to a collaborative partnership with the Manitowoc CDA, and will support your brownfield assessment and remediation efforts in many ways, including:

- The DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with these individuals, in your community, to answer questions and discuss local plans, options and best practices.
- The DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining EPA funding for this grant application is consistent with community needs, vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

Sincerely,

Christine Haag, Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Copy: Tauren Beggs – DNR NER

1.a Project Area Description and Plans for Revitalization – Target Area and Brownfields

(i) **Background and Description of Target Area.** The City of Manitowoc (City), Wisconsin is located on the western shoreline of Lake Michigan at the confluence of the Manitowoc River (River). Development in Manitowoc in the early 1800s by European settlers was agricultural, fishing, lumber, and shipbuilding. Settlement was followed in the late 19th Century by large-scale industrial development (tanneries and metal works/foundry operations) in Census Tract 4 (CT-4, the **Target Area**). However, early manufacturers struggled to move large quantities of goods into and out of Manitowoc solely by rail. The Target Property (referred to locally as the River Point District) forms a 21-acre peninsula into the River with 3,500 linear feet of frontage, which made it uniquely suitable for development as a railroad loading/transloading yard and shipping port in the late 19th Century. As a bi-modal port, early operations at the Target Property allowed direct rail access onto cargo ships meaning goods could be carried by rail directly from factories in Manitowoc and driven onto cargo ships for transport and delivery to other ports on the Great Lakes. With the collapse of manufacturing in the 1970s and loss of thousands of jobs and millions of dollars in taxes/wages, the need for rail became obsolete and the economic engine of CT-4 crumbled. Now, inventory activities identified over 132 parcels of land (115 acres) in CT-4 (citywide: 461 parcels=2,321 acres) as potential Brownfields. The legacy of brownfield properties has resulted in considerable need for USEPA funding to facilitate redevelopment. Brownfields in the Cities have led to significant blight, poor economic conditions, and a welfare risk as described in Section 2.a.

The Community Development Authority of the City of Manitowoc (**CDA; the grant applicant**) acquired the Target Property in April 2019 for the purpose of blight elimination and has invested over \$1.3MM in the property to date. However, prolonged operations have resulted in considerable need for USEPA funding to assess legacy environmental subsurface liabilities associated with this brownfield. The **North Central River District Redevelopment Plan** is substantially complete and focuses specifically on the Target Property and will guide the project. This Plan will be supplemented by the City of Manitowoc Comprehensive Plan, the Manitowoc River and Trail Corridor Plan, the Downtown Master Plan, the Downtown Parking Analysis, and the Tax Increment District Nos. 16 & 22 Project Plans (collectively referred to herein as the “Plans”). The greatest needs to be addressed by redevelopment of the Target Property are (1) increased commercial and appealing retail amenities to increase jobs and attract outside businesses, (2) increased greenspace to connect multi-modal trails, and (3) increase residential housing options to support rebuilding the downtown commercial district. The assessment and eventual cleanup of this property is consistent with community needs, vital to the economy and will bring improvements to the quality of life in CT-4.

(ii) **Description of the Priority Brownfield Site.** Remaining structures were recently removed; and the Site is unoccupied. However, the Site is adjacent to a residential area and poses significant known risks to human health and surface water from multiple spills. This property was selected as a priority because large (21 acres) mixed-use redevelopment represents the greatest potential to catalyze significant economic investment in downtown Manitowoc. As noted in Section 2.a, the welfare and health of a variety of sensitive populations are impacted by brownfields, including the Target Property.

Target Property	Prior Land Uses / Known Spills	Known (Possible) Impacts Soil/ GW	Possible Health Impacts	Surface Water Receptor
River Point District (21 acres; CT-4)	21-acre railyard; bulk fuel depot, coal dock, engine house (4 known spill cases)	Heavy metals, PAHs, VOCs, SVOCs, PFAS, Cyanide	Birth defects; cancer; nervous system damage; liver, brain, and lung cancer; and reprod. damage	Property on 3,500 linear feet of River frontage; River flows to Lake Michigan, 0.5 miles downstream of Site.

Note: PAH – Polycyclic aromatic hydrocarbons; sVOCs – (semi) volatile organic compounds; PFAS - Per- and polyfluoroalkyl substances; health impacts from www.atsdr.cdc.gov/toxfaqs/index.asp based on known/suspect constituents

1.b Project Area Description and Plans for Revitalization – Revitalization of the Target Area

(i) **Reuse Strategy and Alignment with Redevelopment Plans.** The North Central River District Redevelopment Plan is substantially complete and additional *Plans* described in Section 1.a(i) highlight the redevelopment of brownfield properties for mixed use, specifically the Target Property, as central to catalyzing economic investment in downtown Manitowoc. As a large 21-acre assemblage of land and a gateway property to the City, redevelopment will advance the goals of the *Plans* by increasing

residential/commercial opportunities in the downtown area while increasing greenspace/parkland and enhanced recreational access to the River and the bimodal trail. By providing for increased housing options in downtown Manitowoc, redevelopment of the Target Property will catalyze much needed and infrastructure investment and commercial growth in downtown Manitowoc (including the Opportunity Zone). By increasing recreational access to the River, the Property will become a destination space, which will further spur commercial investment in downtown Manitowoc. However, the Target Property represents a significant (potential ongoing) direct threat to the environmental health of the River and Lake Michigan, therefore, assessment will be critical in implementing the *Manitowoc River and Trail Plan*. The *Comprehensive Plan* and additional *Plans* will be utilized during the assessment and redevelopment to align activities with the community's land use and revitalization plans. Community input is ongoing.

(ii) Outcomes and Benefits of Reuse Strategy. The goals of the CDA (the grant applicant) for the property and the Plans (see Section 1.a(i)) are in direct alignment with the USEPA/HUD/DOT *Livability Principles* as summarized in the following conceptual reuse scenario for the Target Property. **Increase Transportation Choices** - construct kayak and canoe launches to the River to increase recreational use of the River and construct 5,000 + linear feet of new bimodal trail to link existing city trail to county trail; construct new bus stops and sidewalks; **Equitable Affordable Housing** - site redevelopment includes potential for 560,000+ square feet of new multi-family residential construction. Positive influence on all surrounding neighborhoods with removal of blighting influences. **Enhance Economic Competitiveness** - 406,000+ square feet of new mixed-use commercial (retail, restaurant, office) space. **Support Existing Communities** - cleanup and reuse of Target Property has transformative impact on entire downtown commercial area and site is a Gateway feature with massive visual impact. **Leverage Funding** - redevelopment estimated between \$116MM and \$250MM of private investment. **Value Community** - eliminate blight for safe/walk-able areas, increase River and bimodal trail access, construct 74,000+ square feet of greenspace, construct new downtown gateway, stabilize surrounding neighborhoods, and manage soil/sediment contamination immediately adjacent to the River. **Opportunity Zone** - the Property is adjacent to an Opportunity Zone and the scale of redevelopment at the Property will undoubtedly radiate into the Opportunity Zone, to stimulate the redevelopment of 20 acres or more of current brownfields for commercial and industrial reuse, leveraging upwards of \$500MM in investment.

1.c Project Area Description and Plans for Revitalization – Strategy for Leveraging Resources

(i) Resources Needed for Site Reuse. Leverage and coordinated public funding are cornerstones of the Manitowoc brownfields program. The CDA has already leveraged \$1.3MM in local and state funding for acquisition, planning, and assessment at the priority Site. This grant will provide a catalyst for securing additional external funds described below. If the CDA cannot pursue funding directly, they will support the City in pursuit of funding opportunities further summarized below to facilitate reuse.

Eligible and Secured – Tax Incremental Financing District (TID). Perhaps the most important source of funding is TIDs which can be used for environmental cleanup and infrastructure improvements needed to support redevelopment of Brownfield sites. TID 22 was formed in 2020 with a budget of \$11.2MM specifically for environmental cleanup and infrastructure costs at the Target Property. TID 22 can be supplemented by overlapping TID16, which has an additional \$300K per year budgeted for environmental related work. However, these funds cannot be accessed until the investigation proposed in this application is complete.

Eligible and Secured - Capital Improvement Program. Redevelopment of the Property will link to \$7MM in recent riverfront development investment within the downtown and working harbor. To enhance the walkability in the Target Area, since 2012, the City has replaced defective/deteriorated sidewalks with new concrete walkway along 14.7 miles of roadway at an estimated expenditure of \$300,000. To combat blight and reduce crime, the City has installed decorative (underground) street lighting, new concrete curb and gutter and sidewalks, new asphalt pavement, trash receptacles, benches, and trees in portions of the target area (\$135,000). New bridges/sidewalks were constructed along the Manitowoc River to enhance the walkability in the downtown corridor (\$102,000). The infrastructure investments will enhance the success in revitalizing brownfield properties assessed during the project.

Eligible and Secured – RLF Loans. Multiple RLF loans are available to the CDA and future developers to support cleanup/redevelopment of the Target Property. The City of Manitowoc operates a \$1MM Brownfield Cleanup RLF capitalized in FY13 by USEPA; \$220K has revolved and available to support cleanup projects.

Eligible and Pending - State/Fed. The CDA is eligible and will pursue funding from potential sources including, but not limited to Fed. (USEPA, USDA) and State (WEDC Site Assessment Grant and WAM [assessment]; WEDC [cleanup]; and WDNR [loans/grants]) agencies. State grants often require a match, which is impossible to fund internally. This grant could serve as the State-required match, which will help secure future cleanup grants.

(ii) Use of Existing Infrastructure. Redevelopment of this property will leverage recent city-wide infrastructure investments made by the City, including drinking water Microfiltration Plant upgrade (\$3.8MM) and wastewater treatment plant upgrade (\$9MM) and planning studies described in Section 1.a(i). Additional leverage includes infrastructure investments made by the City, such as expanding utility access and better integration of complete streets (i.e. bikeable/walkable) concept. A new bus stop will be installed at the property to link the community to the transportation center (located south of the Target Property); therefore, the Site is uniquely located to facilitate transportation options. Future infrastructure investments at the priority brownfield properties will include ~1 mile of new utilities and road/transportation projects, which can be accomplished using WisDOT, local TID, and/or County CDBG RLF funding. This property will leverage \$4.6MM in recently awarded CDBG CLOSE funds for work on nearby City streets. Additional State and Federal infrastructure grants will be sought by the CDA/City.

2.a Community Need and Community Engagement – Community Need

(i) The Community's Need for Funding. This grant will meet the needs of a community that has an inability to draw on other sources of local funding to carry out investigations due to a small population and low income due to job losses, exacerbated by COVID-19 and limited/restricted State/Local funding (e.g. closing the Petroleum Environmental Cleanup Fund Award (PECFA) and restrictions on state programs). The Target Property ceased rail operation over 3 decades ago, therefore, the financial need is related to the need for investigation.

Small Population Size: A limiting economic factor is the City's lack of "entitlement status"; therefore, the City does not receive an annual allocation of CDBG funds that could be a key source of assessment funding. Also, the population is 32,798, which is too large to receive USDA brownfield funds.

Loss of Jobs. Manitowoc has experienced many economic challenges over recent decades associated with globalization and its impact on the manufacturing sector which provided the foundation for the City's prosperity. Rising global competitiveness and off-shoring to reduce labor costs, resulted in major job losses. In the late 1980s, the first major plant closed. The initial economic impact was the loss of \$19,000,000 in annual wages and benefits associated with the 1,150 relatively high wage manufacturing jobs. In the past 6 years, the region's manufacturing base has lost over 7,000 jobs, or 17% of peak employment. Last spring, the region's higher education sector was dealt a major blow when Holy Family College closed (110 jobs). This continued loss in jobs has resulted in continued decrease in local tax revenue that would otherwise be available to complete the necessary assessments at the Target Property.

Limited State/City Funding. As reported in March 2019 by the [Wisconsin State Journal](#), the Wisconsin structural deficit is estimated to be \$2 billion through the 2021-2023 budget cycles, which will result in reductions in shared revenue and other State aid to municipalities. State budget was further crippled due to an estimated [\\$300mm](#) in revenue losses due to COVID-19, which will come as cuts to existing programs. Therefore, State/City funds are limited. As previously noted, approximately 2,321 acres of land in the City have been identified as potential brownfield sites. It would cost the City \$51+ million just to complete the first two phases of due diligence at identified sites. For reference, this estimate is double the general revenue budgeted for 2020.

Closing the State Petroleum Tank Fund: Wisconsin established the Petroleum Environmental Cleanup Fund Award program to investigate and remediate releases from eligible petroleum tanks; however, the program closed; therefore, this funding source is no longer.

New Restrictions on State Brownfield Funds: One of the most important funding cuts affecting brownfields was the elimination of the WDNR's Site Assessment Grant Program, which during 1999-2010, provided 474 grants totaling \$16,500,000 for use by local governments in assessing brownfields. The Brownfield Green Space and Public Facilities Grant Programs were also eliminated.

(ii.1) Threats to Sensitive Populations – Health or Welfare of Sensitive Populations. Indicators of economically impoverished and disproportionately impacted populations summarized below reflect a gradual (sometimes punctuated) decline in economic condition since 1970 when manufacturing was the economic foundation in Manitowoc. Due largely to the collapse of the manufacturing sector, the Target Tract experienced a **30% decrease in population, 33% decrease in average income, and 110% increase in the poverty rate** (socialexplorer.com), which is why this area is critical. Concurrently, **minority populations increased 80%** and the Latino population is expected to keep growing due to a relatively large percentage of young persons and higher rates of immigration. The Hmong population continues to grow and **Asian poverty has tripled since 2009** (data not available for 1970).

Demographic Indicator	Census Tract 4	City of Manitowoc	Manitowoc County	State of WI	US
Population (change since 1970)	3,843 (-29%)	32,798 (na)	79,407 (-2%)	5.8m (+45%)	322.9m (na)
Percent Poverty Rate (change since 1970)	12.7% (+110%)	15.0% (na)	10.6% (+81%)	11.9% (+66%)	14.1% (na)
Mean Household Income (change since 1970 in 2014 \$\$)	\$53,750 (-33%)	\$45,485 (na)	\$53,489 (-27%)	\$59.2k (-21%)	\$60.3k (na)
Percent Minority (change since 1970)	8.8% (+77%)	10.3% (na)	5.7% (+98%)	14.4% (na)	27.3% (na)
Percent Hispanic or Latino (change since 1970)	8.3% (+37-fold)	5.2% (na)	3.8% (+4-fold)	6.7% (na)	17.8% (na)
Percent Asian Poverty (change since 2009)	14.0% (+3-fold)	41.8% (+3-fold)	38.7% (+3-fold)	17.6% (na)	11.6% (na)

Sources: ¹ 2013-18 Data available online with subscription at policymap.com. Data from 1970 per socialexplorer.com with a subscription.

Access and Food Security: Obesity and food insecurity continue to be significant social justice issues in the Target Area. The density of fast food restaurants in the City of Manitowoc (3.59 per 10,000 population) is one of the greatest in the State of Wisconsin (wgntv.com).

Safety Concerns and Increase in Crime: Although crime rates for the target census tracts are not available, the 2017 aggravated assault rate (238/100,000) and burglary rate (2,691/100,000) in Manitowoc are greater than the aggravated assault and burglary rates (192/100,000 and 1,564/100,000, respectively) in the rest of the County (11/10/19; policymap.com). Non-violent crimes are often less reported, especially by sensitive populations (i.e. minority communities) for fear of retribution.

Lack of Transportation: Very few members of the community utilize public transportation to get to work (ex. 0% in CT-4 compared to 5.1% in the US; 11/10/19 policymap.com). Instead, many walk, which is especially difficult in the winter due to the estimated 42 inches of snow in the City (double US average) and wind chills down to -20°F (Oct 20; weatherspark.com) disproportionately impacting minority populations, who are more likely to walk due to inherent challenges with language (percent who walk and speak English less than “very well” in Manitowoc ~ 33%; WI=5%).

Cumulative Environmental Issues. Interstate I-43 bisects the City of Manitowoc, which the WI Dept. of Transportation estimates 42,400 cars use per day; concurrently, 26,000 cars per day use the two primary arterial streets in CT-4 (Oct 20; trust.dot.state.wi.gov) which partially explains why CT-4 is in the upper 60th-70th Percent for Ozone; Respiratory Haz. Index; Toxic Cancer Risk; and PM 2.5 (EJScreen).

Improve Welfare. Assessment and redevelopment of the Target Property for mixed-use commercial/residential and green space will improve welfare conditions by increasing healthy housing, decreasing source areas, increasing job options in affected neighborhoods, decreasing crime, and making the surrounding neighborhoods walkable.

(ii.2) Threats to Sensitive Pop. – Greater than Normal Incidences of Disease & Adverse Health Cond.

Asthma. The 2018 [National Toxic Release Inventory](#) report by USEPA for the City of Manitowoc indicates a total of 3.2MM pounds of toxic chemical waste was generated at 18 regulated facilities. Air quality is significant, and although not available for the Target Area, data from the ALS State of the Air 2020 report (Oct 20; [lung.org](#)) gives Manitowoc County an “F” for ozone pollution. Undoubtedly, poor air quality has a disproportionate health impact on asthmatic populations, as summarized below:

Pediatric Asthma	Adult Asthma	COPD	Cardiovascular Disease	Children Under 18	Adults 65 and over	Poverty	Total Population
1,371	5,688	3,653	5,345	16,260	16,193	8,124	79,704

Birth Defects. Birth defect rates are not available for the Target Areas. [Wi. Dept of Health County Profile](#) indicates the rate of congenital anomalies in the County is 1.1%, which is double the adjacent county.

Overall Health and Cancer Rates. Although data for the target is not available, the [2020 Population Health Institute at Univ. of Wisconsin](#) ranked Manitowoc County 47 out of 72 Counties in Wisconsin for overall health based on characteristics associated with sensitive populations: morbidity (which included self-reported fair or poor health, poor mental health days, and percent of births with low birth weight); social and economic factors (which included measures of education, employment, income, family and social support, and community safety); and physical environment (which included many EJ parameters). Obesity remains a significant challenge in Manitowoc County and Target Area, with 18% of the low-income preschool children considered obese and 31% of the adult population considered obese, which places the County in the highest quartile compared to other counties in Wisconsin. The [Wisconsin Dep. of Health County Profile](#) for Manitowoc County indicates the age-adjusted cancer rates for acute lymphocytic leukemia; bladder, brain/CNS, melanoma, and pancreatic cancer; and pediatric acute lymphocytic leukemia are all greater than the State rate. Although the precise cause/source of identified poor health outcomes is likely due to a multitude of factors, known/suspect contaminants of concern identified at the Property are known to cause severe neurological damage and many of the poor health outcomes summarized above. Most directly impacting residences, [WDNR](#) (2020) issued a fish advisory for the River adjacent to the Property extending to Lake Michigan, which is critical to the local Hmong where language barriers exist & exposure risk not understood.

Reduction of Health Risk. Assessment and redevelopment of the Target Property will mitigate these health conditions by decreasing source areas, improving quality of local fisheries, and increasing opportunities for healthy living as summarized in Section 1.b(ii) by creation of bike trails, river access, increased healthy housing, and increased alternative energy/transportation options.

(ii.3) Threats to Sensitive Populations – Disproportionately Impacted Populations. In combination with zoning, persistent policies and questionable industrial operators have disproportionately impacted the community. The City’s legacy of heavy industrial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (women, elderly, children) in this minority-majority neighborhood. The following summarizes disproportionate EJ negative impacts in the Target Areas.

Indications of environmental justice issues in the target Census Tract are summarized on the following.

Environmental Justice Indicator ¹	Census Tract 4	Manitowoc County	State of WI	US
Demographic Index Percentile (index of low-income and minority; percentile) ²	82	Unknown	77	51
Persons (age 16-64) w/ Disability	9.7%	9.5%	9.6%	10.3%
Elderly Persons with Disability	28.9%	28.5%	31.2%	35.0%
Households with Single Mothers and Children (percent change since 1970)	14.9% (+3-fold)	7.2% (+4-fold)	9.4% (na)	10.1% (na)
Households of Single Mother and Children in Poverty	43.5%	43.0%	35.7%	37.5%
Percent of Women Holding Multiple Jobs	10.1%	8.8%	9.1%	NA
Workers who Drive to Work	95.8%	91.8%	89.1%	85.5%

Source: ¹ 2013-18 Data available online with subscription at [policymap.com](#) or ² USEPA [EJScreen](#) at. Accessed Oct 2019

Improved Condition. Assessment and redevelopment of the Target Property will mitigate impacts to disproportionately impacted populations by improving water quality / fishery quality and reducing poverty through increased economic opportunities and overall wellbeing through increased recreation. Redevelopment increases the number and diversity of jobs, increase affordable housing options, increase food security through increased food outlets, and decrease the transportation burden on the community.

2.b Community Need and Community Engagement – Community Engagement

(i) Project Involvement and (ii) Project Roles. The Manitowoc Brownfields Advisory Committee (BAC) was established 6 years ago and has met to provide significant oversight/input on the City's Brownfields program. BAC members reviewed and provided input on this application. Partners will bring important community voices to the table and were targeted to address needs discussed in Section 2.a. Partners affirm their commitment to serve on the BAC. The general public and those affected directly by the Site will be engaged through a Community Involvement Plan (CIP) to be developed in Fall 2021 in collaboration with the BAC and the grantee's ongoing outreach efforts, as described in 2.b.iii.

Organization	Point of Contact	Partner Role / Specific Involvement
The Chamber of Manitowoc County (<i>economic and business development</i>)	Karen Nichols (920) 684-5575 knichols@chambermanitowocounty.org	Continue to serve on the BAC to facilitate redevelopment of the Site for identification of brownfield opportunities within business community.
Progress Lakeshore (<i>economic and business development</i>)	Peter Wills Executive Director 920-482-0540 Peter@progresslakeshore.org	Continue to serve on the BAC to assist with site identification/prioritization and facilitate identification of brownfield opportunities within business community.
Lakeshore Technical College (<i>job training to fulfill newly created jobs</i>)	James Lemerond Dean – Health and Human Svc. 920.693.1871 james.lemerond@gotoltc.edu	Continue to serve on the BAC to assist with site identification/prioritization and facilitate community outreach and job training opportunities.
Lakeshore Community Action Program, Inc. (<i>housing, food security, child svc., social justice</i>)	Chris Loose 920.682.3737	Continue to serve on the BAC to assist and facilitate translation of project materials into Spanish and Hmong and facilitate engagement of minority communities.
USEPA and WDNR VPLE Project Managers	To Be Determined - Provide technical assistance and review/approval work products completed in Tasks 1, 2, and 3 (e.g. SSSAP, Phase II ESAs, Supp SI, RAPs). Aid in coordination with other federal and State agencies, if warranted.	

(iii) Incorporating Community Input. The cornerstone of the City's Brownfields Program is enhancing public education/communication through continued workshops, resident questionnaires, and web-based engagement. Community involvement in the decision-making process at the Target Property began several decades ago. Within one month of award, the CDA will develop a Community Involvement Plan (CIP) to leverage the expertise and networks of the BAC. The CIP will be designed specifically to engage and inform the community members and to provide an avenue for feedback from the community. The approved CIP will be implemented in Fall 2021 to integrate community involvement utilizing the BAC to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the Target Property.

The CDA is finishing a yearlong planning and reuse effort at the Property, which has included a variety of community involvement activities until the COVID-19 pandemic began. Since that time, outreach meetings have used online meeting platforms (e.g. Zoom or Microsoft Teams). Virtual tools have worked extremely well in the past to connect citizens to City-led brownfield redevelopment projects. The CIP will include a variety of socially-distant engagement practices, including expanding virtual tools (e.g. online meeting platforms, social media, and webpage/email updates). Project information will continue to be shared by the Mayor during his routine local radio show. Spanish speakers will be reached through the local Spanish radio station and translated materials provided through local retailers. As renderings are developed, the local newspaper will likely be a significant source of information dissemination. Pop-up displays of Site renderings at the summer farmer's market will allow for socially-distant feedback.

It is anticipated that most project communications will be in English. However, as the brownfield redevelopment project is likely to affect residents with Spanish and/or Hmong as their first language, translations of project materials will be developed in coordination with the BAC. Radio announcements will be made on local Spanish radio stations FM92.7, AM750, AM640, and AM1510. In addition, representatives of the local Spanish and Hmong newspapers will be invited to attend each meeting and will be provided with informational materials for each meeting. Printed materials will be placed in locations in the neighborhoods frequented by these target groups (community centers, ethnic grocery stores, farmer's markets, laundromats, churches, large retail outlets [e.g. Walmart, Lowes, Menards]).

After the pandemic ends, in-person outreach will resume. Community meetings will be held in the evenings to accommodate work schedules of stakeholders. In addition, meetings will be held at a location served by the mass transit system and within walking distance of the target neighborhoods. The meeting facility will be ADA compliant to accommodate needs of sensitive populations (i.e. disabled or elderly). Hard copies of all project outputs will be made available at City Hall to ensure access to stakeholders.

3.a.i – 3.a.iv Task Descriptions, Cost Estimates, and Measuring Progress – Description of Tasks/Activities and Outputs. The CDA has developed the appropriate tools and procedures to immediately begin implementation of this grant and execute key project activities within the performance period. The CDA procured the services of a Qualified Environmental Professional (QEP) in accordance with 2 CFR 200.317 - 200.326 and is the current owner of the Target Property, therefore an access agreement is not needed. As such, the CDA is able to begin work immediately. The following table summarizes the timing of key project activities and responsibilities that will take place to address the Target Property. This is a site-specific application, therefore no EPA-funded activities at non-priority Sites will be required and is omitted from responses to sub-criteria “i.” in the following table.

Task 1 - Activity: Enroll in WDNR Voluntary Party Liability Exemption (VPLE) Program and QAPP/SSSAP Development.
i. Project Implementation: Enroll Property in WDNR VPLE Program; update City's QAPP for use on the project; prepare a SSSAP for WDNR and USEPA approval Non-EPA grant resources needed: None
ii. Anticipated Project Schedule: Quarter 1 – FY2022
iii. Task/Activity Leads: CDA Proj. Mgr. & BAC, with input from QEP and WDNR VPLE
iv. Outputs: (1) VPLE Application; (1) QAPP; (1) SSSAP/HASP
Task 2 - Activity: Phase II ESAs
i. Project Implementation: Complete (5) Phase II ESA per ASTM 1903-19 in potential release areas. Non-EPA grant resources needed: None
ii. Anticipated Project Schedule: Quarter 2 – FY2022 through Q2 FY2023
iii. Task/Activity Leads: QEP and CDA Project Manager, with input WDNR VPLE
iv. Outputs: (5) Phase II ESA Reports
Task 3 - Activity: Supplemental Site Investigations and Remedial Action Planning
i. Project Implementation: Complete (2) Supplemental Site Investigations with quarterly groundwater monitoring, develop (2) remedial action plans Non-EPA grant resources needed: None
ii. Anticipated Project Schedule: Quarter 3 FY2023 – Quarter 2 FY2024
iii. Task/Activity Leads: CDA Project Manager, with input from QEP and WDNR VPLE
iv. Outputs: (2) Supplemental Site Investigations & (2) Remedial Action Plans
Task 4 - Activity: Community Outreach
i. Project Implementation: Prepare Site-Specific Community Involvement Plan (CIP), host design charettes and public meetings to discuss Site assessment and redevelopment plans Non-EPA grant resources needed: None
ii. Anticipated Project Schedule: Quarter 1 – FY 2022 through grant performance period
iii. Task/Activity Leads: CDA Project Manager and BAC, with input from QEP
iv. Outputs: (1) CIP; design plans/charettes, sign-in sheets, handouts, fact sheets

Task 5 - Activity: Program Management
i. Project Implementation: Prepare Quarterly Reports, Annual Financial Reports, and MBE/WBE Reports; Update ACRES Non-EPA grant resources needed: None
ii. Anticipated Project Schedule: Quarter 1 – FY 2022 through grant performance period
iii. Task/Activity Leads: CDA Project Manager and Project Coordinator with input from QEP
iv. Outputs: (12) Quarterly Reports; (2) Annual Financial Reports; (2) MBE/WBE Reports

3.b Task Descriptions, Cost Estimates, and Measuring Progress – Cost Estimates. Descriptions and budget justifications below are based on costs incurred during a similar Site-Specific Assessment grant. By State statute and local ordinance, the City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA (the grant applicant). Personnel costs below reflect City staff time and are a combination of labor (\$38/hr) + fringe (\$12) = \$50 (average).

Line #	Budget Categories (program costs only)	Task 1	Task 2	Task 3	Task 4	Task 5	Total
		Enroll in WDNR VPLE, SSAP/HASP	Phase II ESAs	Supplemental Investigations, Remedial Plan	Community Outreach	Program Management	
1	Personnel				\$2,850	\$5,928	\$8,778
2	Fringe				\$900	\$1,872	\$2,772
3	Supplies				\$600		\$600
4	Contractual	\$6,000	100,000	\$67,000		\$6,400	\$179,400
5	WDNR Fees	\$4,250	\$2,100	\$2,100			\$8,450
6	TOTALS	\$10,250	\$102,100	\$69,100	\$4,350	\$14,200	\$200,000

Task 1: Enroll in WDNR VPLE Program and QAPP/SSAP Development – (\$10,250) – To provide for maximum future liability protection and encourage interest/investment in the property by potential developers, the property will be enrolled in the more stringent WDNR Voluntary Party Liability Exemption (VPLE) program. The VPLE program is an elective program whereby the property would receive an exemption from future environmental liability once the assessment and cleanup activities are considered complete. Investigation/remedial planning (followed by cleanup/redevelopment) under the VPLE program will provide an extraordinary level of comfort to large lending institutions to fund redevelopment projects that otherwise may be deemed too risky due to environmental contamination, often at more competitive interest rates. \$4,250 of USEPA funds will be used to pay the statutorily required VPLE application fee. The executed VPLE application will serve as an output for Task 1. \$3,000 of USEPA funds will be used to contract with a QEP to adapt the City's current Quality Assurance Project Plan (QAPP) for use on this project and \$3,000 for the QEP to prepare a Site-Specific Sampling and Analysis Plan/Health and Safety Plan for submittal to USEPA and the WDNR VPLe committee for review/approval prior to initiation of Task 2. QAPP & SSAP/HASP are outputs.

Task 2: Phase II Environmental Site Assessments (\$102,100) – The Property is 21 acres with multiple RECs and a variety of constituents detected in soil in groundwater in the Stantec (2020) [Phase II ESA](#); therefore, multiple Phase II ESAs are warranted. USEPA funds will be used to contract with a QEP to complete focused Phase II ESA subsurface investigations in a phased approach at several potential source areas and recognized environmental conditions described in the Stantec (2016) Phase I ESA. Due to multiple source areas, results of work completed to date, and anticipated requirements of the WDNR VPLe program, up to five Phase II ESAs to be completed based on identified source areas per ASTM E1903-19, WDNR guidelines, & State statute. Phase II ESAs are likely to include investigating PFAS concurrent with releases of hazardous substances and petroleum. We estimate needing to complete 5 focused Phase II ESAs in a phased approach at the Property at an average cost of \$20,000 each. WDNR review and oversight fees during Task 2 under the VPLe program are estimated to be \$2,100 (20h @ statutorily required \$105/hr). The reports for each investigation will serve as outputs for Task 2 and submitted electronically or on double sided recycled paper. Task 2 is 51% of the budget.

Task 3: Supplemental Site Investigations and Remedial Action Plan (\$69,100) – USEPA funds will be used to contract with a QEP to complete supplemental site investigations and a remedial action plan. Due to multiple source areas, results of work completed to date, and anticipated requirements of the WDNR VPPE program, we estimate needing to complete 2 supplemental site investigations to delineate the horizontal/vertical extents of residual impacts to soil and groundwater identified during Task 2 (@ \$24,500 per investigation). Due to the size of the Property, 2 remedial action plans are anticipated (@ \$9,000 each). WDNR review and oversight fees during Task 3 under the VPPE program are estimated to be \$2,100 (20hr @ statutorily required \$105/hr). Reports developed for each phase of the investigation will serve as outputs for Task 3 and submitted electronically. Task 3 is 35% of the budget.

Task 4: Community Outreach and Involvement – (\$4,350) – USEPA funds will be used by the City to work with the BAC to prepare a Site-Specific CIP to facilitate community outreach activities, public meetings, media/radio, education, and other outreach activities (75hr @ \$50/hr). Outreach activities will include public notice advertisements, mailings, website development, display materials costs, printing fact sheets and various media events. These deliverables will serve as outputs for Task 4. \$600 of USEPA funds will be allocated to project supplies such as brochures, fact sheets, poster displays and other printed materials for public distribution and outreach displays at events (600 copies @ \$1/copy).

Task 5: Program Management – (\$14,200) – \$7,800 of USEPA funds will be used to cover City personnel costs for program management (156h @ \$50/hr) as follows: managing consultant activities (2h/mo=72hr), preparation of quarterly reports and maintenance of the ACRES database (5hr/quarter = 60hr), annual financial and disadvantaged business enterprise reporting (8hr/yr=24hr). \$6,400 of USEPA funds will be used to contract with a QEP to assist with Program Management (64h @ \$100/hr). Report documents will serve as outputs for Task 5.

3.c Task Descriptions, Cost Estimates, and Measuring Progress - Measuring Env. Results.

Project results/outputs and outcomes will be tracked using existing tools developed by the grant applicant during the project in quarterly progress reports and annual financial reports prepared under Task 5. Project outputs and schedule will be tracked continuously to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. Outputs will be compared to the project schedule proposed in Section 3(a); if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones/ deliverables, and leveraged resources will further be tracked on a monthly/quarterly basis in the ACRES database. Overall project outcomes are difficult to track/quantify but redevelopment as described in Section 1.b(ii) will result in (1) increased commercial and appealing retail amenities to increase jobs and attract outside businesses, (2) increased greenspace to connect multi-modal trails, and (3) increase residential housing options to support rebuilding the downtown commercial district. If the timelines for advancing 1 or more phase of work at the Target Property is not well aligned with the EPA grant project period, then the CDA and QEP will work with WDNR/EPA to adjust the approach to maintain progress on achieving the project outcomes.

4.a Programmatic Capability and Past Performance – Programmatic Capability

(i) Organizational Structure. By State statute and local ordinance, the City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA, the grant applicant. As noted in Section 4.a(ii), this grant will be managed by the same team of City staff members who established the City's Brownfields program and are currently involved with management and implementation of the FY 18 USEPA CWA and FY18 SSA grants and the FY 13 USEPA RLF grant. The CDA has retained a QEP per the requirements of 2 CFR 200.317 - 200.326 to assist in managing grant activities and perform the environmental assessment tasks. The City Finance Department will provide financial tracking and grant documentation support to ensure that grant requirements are met. The CDA will also use the expertise of the BAC, City, WEDC, and USEPA to provide guidance and marketing to support use of grant funds to promote reuse of the Target Property.

(ii) Description of Key Staff.

Mr. Adam Tegen, Community Development Director, will function as the Brownfield Project Manager for this project and will be responsible for project performance and coordination with USEPA/WDNR. Mr.

Tegen currently serves as the project manager for the City's FY18 USEPA CWA grant and FY13 RLF grant and the CDA's FY18 USEPA SSA grant. Mr. Tegen has served in planning, zoning, and economic development for over 19 years as a municipal staff member. Mr. Tegen managed additional projects with the City, including WEDC Site Assessment Grants for demolition and testing on the Target Property. At the City of Wisconsin Rapids, Mr. Tegen oversaw the redevelopment of the defunct Rapids Mall into the new YMCA and Boys & Girls Club; CDI grant for the redevelopment of the Tribune Building; and several Stewardship Grants for the improvement of parks and trails along the Wisconsin River in downtown. As Community Development Director for the City of Manitowoc and Executive Director to the CDA, Mr. Tegen leads all brownfield and economic development efforts in Manitowoc.

Mr. Paul Braun, City Planner, will function as the Brownfield Project Coordinator for this project and will coordinate work with the QEP and other City departments. Mr. Braun has provided oversight and management of the FY13, FY15, FY18 USEPA CWA grants (\$1.1MM), FY18 USEPA SSA grant (\$200k), previous State brownfield grants (\$1.2MM) and the FY13 USEPA Brownfield RLF grant (\$1m). In this role, Mr. Braun verified compliance with all reporting and financial responsibilities for Manitowoc and is credited for successfully meeting all USEPA (and State) milestones. Mr. Braun's passion, vision, and commitment to a greener Manitowoc has been instrumental in creating community partnerships, teamwork with the USEPA/WDNR project managers, and strategic assessment resulting in economic development and protection of health and the environment. During the past five years, Mr. Braun has directly managed/overseen/coordinated implementation of over \$5MM in grant-funded projects; including the above grants and State of Wisconsin Coastal Management Grants. In the event of future personnel turnover, the planned "team" approach will prevent any interruptions with the implementation of the project. Mr. Braun has been involved in daily grant operations for the previously funded CWA and RLF grants and will become familiar with the new grant operations so he can immediately step in as either interim or replacement project manager in the case of loss/reassignment of the active Project Manager, Mr. Adam Tegen. Mr. Tegen and Mr. Braun will capitalize on the expertise of three additional key City staff members including a GIS Specialist, a Planner, and an administrative support.

(iii) Acquiring Additional Resources. The CDA has retained a QEP per the requirements of 2 CFR 200.317 - 200.326 to perform the environmental assessment tasks. If needed, additional contractors can be procured following similar procurement methods. The CDA will utilize the expertise of the BAC, to provide additional guidance on strategic use of grant funds to successfully complete the project.

4.b(i) Past Performance and Accomplishments – Currently Has or Previously Received an EPA Brownfields Grant.

i) USEPA Site-Specific Brownfield Assessment Grant for Hazardous Substances (FY18; \$200K)

1. Accomplishments: A SSA grant was awarded to the CDA for completion of a Site Investigation at 1512 Washington St. Extensive soil and groundwater sampling was completed in 2019-2020 and achievements were accurately reflected in ACRES. Redevelopment plans are being developed.

2. Compliance with Grant Requirements: The CDA maintains compliance with the workplan/schedule and the terms/conditions of the cooperative agreement. The CDA is meeting all required financial reporting and quarterly reports. The grant performance period is 2019-2021 and remaining budget is \$45K; however, CDA is on track to close the SSA and redevelop the Site 1.5 years ahead of schedule.

i) USEPA Brownfield Cleanup RLF Subgrant for Hazardous Substances (2016; \$350K)

1. Accomplishments: A cleanup subgrant was provided to the CDA for abatement of asbestos from 1512 Washington Street. No funds remain in the subgrant. Achievements were accurately reflected in ACRES and include leveraging \$2,400,000 in local and \$500K in state cleanup funds.

2. Compliance with Grant Requirements: The CDA maintained compliance with the workplan/schedule and the terms/conditions (including compliance with the Davis-Bacon Act). The CDA met all required financial reporting and quarterly reports to maintain the integrity of the RLF loan journal and related components of the City's Brownfield Cleanup RLF. All funds were expended.

ATTACHMENT A1: THRESHOLD CRITERIA

Name of Applicant: **Community Development Authority of the City of Manitowoc, Wisconsin**

1. Applicant Eligibility

The Community Development Authority of the City of Manitowoc, Wisconsin (the grant applicant and current property owner) is a quazi-governmental entity that operates under the supervision and control of, and as an agent of, the City of Manitowoc, Wisconsin, which is a “general purpose unit of local government” as that term is defined in 2 CFR 200.64. Therefore, the Community Development Authority of the City of Manitowoc is eligible to receive a USEPA cooperative assistance agreement.

The Community Development Authority of the City of Manitowoc consists of seven resident/citizen Commissioners appointed by the Mayor with confirmation from the Manitowoc Common Council. The Community Development Authority of the City of Manitowoc has powers, duties and functions set out in Section 66.1335 of the Wisconsin Statute for housing and redevelopment authorities. Duties of the Community Development Authority include blight elimination, slum clearance, urban renewal, and redevelopment. For the purpose of blight elimination and slum clearance, the Community Development Authority of the City of Manitowoc acquired the subject Brownfield property on April 12, 2019. Documentation regarding additional threshold eligibility criteria for the grant applicant and the target Brownfield property is provided in Section 3.

2. Community Involvement

Community involvement in the decision-making process at the Site began several decades ago when the City realized the potential for the Site. Due to the central location of the subject property, the Site is featured prominently in planning documents prepared during the last ~20 years for redevelopment of downtown Manitowoc. Prior to the COVID-19 pandemic, numerous public meetings were held to engage the community and gain community input as the CDA evaluated acquisition options.

The CDA is finishing a yearlong planning and reuse effort at the Property, which has included a variety of community involvement activities until the COVID-19 pandemic began. Since that time, outreach meetings have used online meeting platforms (e.g. Zoom or Microsoft Teams). As the project transitions to focused reuse planning, a Community Involvement Plan (CIP) will be developed by the Community Development Authority for review/approval by the Manitowoc Brownfields Advisory Committee (which was established by the City through official resolution) and USEPA. The approved CIP will be implemented in Fall 2021 to integrate community involvement utilizing the Manitowoc Brownfields Advisory Committee to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the subject property. The CIP will allow the grant applicant to inform and involve the community and other stakeholders during the planning, implementation, and other Brownfield assessment activities described in this proposal.

Virtual tools have worked extremely well in the past to connect citizens to City-led brownfield redevelopment projects. The CIP will include a variety of socially-distant engagement practices, including expanding virtual tools (e.g. online meeting platforms, social media, and webpage/email updates). Project information will continue to be shared by the Mayor during his routine local radio show. Spanish speakers will be reached through the local Spanish radio station and translated materials provided through local retailers. As renderings are developed, the local newspaper will likely be a significant source of information dissemination. Pop-up displays of Site renderings at the summer farmer's market will allow for socially-distant feedback. The displays could have QR Codes to allow cell phone users direct access to the project website to leave comments.

Once the COVID pandemic ends, outreach will likely transition back to more in-person meetings, such as design charettes and small-group meetings. Meetings will be held in a convenient location that is ADA-accessible and serviced by the local mass transit network. Meetings are expected to be held in the evening to accommodate working members of the community. However, virtual tools will remain to accommodate those with limited mobility/access.

3. Expenditure of Grant Funds

The CDA currently has a site-specific assessment grant for 1512 Washington Street awarded under cooperative agreement BF00E02380. As of October 1, 2020, 77.4% of the grant has been expended, leaving a balance of \$45,209.31. A screen shot of the ASAP balance sheet taken on 9/28/2020 is shown below.

Recipient : COMMUNITY DEVELOPMENT AUTHORITY (1130720)					
Federal Agency : RTPEC-Grants (68128933)					
Cash on Hand : \$			Total : \$		
Account ID	Account Status	Requestor Reference Number	Available Balance	Amount Requested	
BF00E02380	Open		\$45,209.31		
BF00E02380 - G5RYNY00	Open			\$	

ATTACHMENT A2: ADDITIONAL CRITERIA FOR SITE-SPECIFIC PROPOSALS

The City of Manitowoc submitted a property-specific eligibility determination to USEPA on June 11, 2018 to facilitate completion of due diligence prior to the Community Development Authority of the City of Manitowoc acquiring the property for the purpose of blight elimination. The eligibility determination was approved by the City's USEPA program manager (Mr. Christopher Choi; USEPA Region 5) on June 28, 2018.

Responses to the required information in the sections below reflect information previously provided to USEPA and provide updated documentation on Site activities related to continuing obligations completed by the current owner since the CDA acquired the target brownfield on April 12, 2019. The 20-acre River Point District consists of five contiguous parcels defined in ACRES as follows:

Address	ACRES ID
1200 Buffalo Street	239719
1110 Buffalo St	239716
1101 Buffalo Street	239718
1103 Chicago St	239717
200 N 10th Street	239715

1. Basic Site Information

- (a) Site Name: River Point District
- (b) Site Address: Intersection of North 11th Street and Chicago Street
- (c) Current Site Owner: Community Development Authority of the City of Manitowoc
- (d) ACRES ID: As summarized in the table provided above, the Site is being tracked in ACRES under (5) ID numbers corresponding to arbitrary addresses assigned for grant tracking purposes.

2. Status and History of Contamination at the Site

- (a) Site Contamination: The target Brownfield property is contaminated with hazardous substances related to previous railroad, bulk petroleum, and manufacturing use of the Site.
- (b) Operational History and Current Use of the Site: As described in the Stantec (2019) *Phase I ESA*, the property appears undeveloped in 1835. Historic records indicate the Parcel was transferred from the Manitowoc Terminal Company to the Manitowoc and Western Railroad Company on July 22, 1895, which is consistent with railroad development in the late 19th Century. Assessor records suggest the property was later transferred to the Soo Line Railroad Company and ultimately transferred to the current owner (Wisconsin Central Limited) sometime during the latter half of the 20th Century. In addition to railroad use during the 20th Century, larger portions of the property were leased to industrial tenants for bulk coal transloading/storage, petroleum storage, ship building, grain storage/elevator, metal/scrap/junk yard, and transloading of stone along the southern portion of the Property. Railroad use of the Site ceased in the 1980s and the Site was decommissioned in the 2000s.

The CDA began due diligence investigations in Fall 2018, acquired the Site on April 12, 2019, and completed an extensive Phase II ESA in early 2020. Work completed in summer 2020 has included removal of remaining oil house and warehouse slabs in combination with continued subsurface investigations.

The Site is currently vacant, except for a small wood-truss assembly operation on the northern portion of the Site.

(c) Environmental Concerns: Multiple phases of due diligence have occurred at the Site. A Phase I ESA was completed on behalf of the current owner/grant applicant (the Community Development Authority of the City of Manitowoc) on March 21, 2019 by Stantec (2019) utilizing USEPA Brownfield Assessment grant funding provided to the City of Manitowoc. The Stantec (2019) Phase I ESA provides a summary of the following reports, which document residual hazardous substance impacts to Site soil/groundwater:

- NET, 2005, Case Closure and GIS Registry of 1114 Buffalo Street, October 17, 2005.
- TRC, 2007, Case Closure and GIS Registry Information of former Turntable and Roundhouse, February 22, 2007.
- WDNR, 1993, Case Closure of 200 N 10th Street, April 6, 1993.

Environmental assessment activities have continued at the Site as part of post-acquisition/continuing obligations and were summarized in a comprehensive site-wide Phase II ESA (Stantec, 2020).

Soil:

Similar to previous investigations, select volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), cyanide, and heavy metals were detected in soil at concentrations greater than applicable health-based soil quality standards. The investigation identified multiple fill units, including a sitewide heterogeneous granular black anthropogenic fill unit of varying quality. Ubiquitous soil impacts are largely attributable to the granular anthropogenic fill across the site, which is present in thicknesses of up to eight feet. Additional soil impacts appear associated with either former railroad use or prior activities of former industrial tenants. The Stantec (2020) Phase II ESA recommended continuing the investigation to provide for further source identification and further delineate the vertical and horizontal extents of impacts to soil.

Groundwater:

The potentiometric surface of shallow groundwater grades downward in a radial manner towards the Manitowoc River, which serves as a constant head boundary for groundwater. Select VOCs, sVOCs, dissolved heavy metals, per- and polyfluoroalkyl substances (PFAS) and/or cyanide were detected in groundwater at concentrations greater than health-based groundwater quality criteria. The Stantec (2020) Phase II ESA recommended continuing the investigation to provide for further source identification and further delineate the vertical and horizontal extents of impacts to groundwater.

Subsurface investigations at the Site have largely been limited to easily accessible portions of the Site where vertical clearance and remaining infrastructure allowed for use of common drilling equipment. The need to further evaluate the six Recognized Environmental Conditions (RECs) identified in the Stantec (2019) Phase I ESA and impacts documented in the Stantec (2020) Phase II ESA is prompting the current owner to apply for this site-specific assessment grant.

- (d) Sources of Environmental Contamination and Extents of Impact: The Stantec (2019) Phase I ESA identified six Recognized Environmental Conditions (REC). Any of these RECs could be a source of contamination. The proposed site-assessment project will focus on further delineating the horizontal and vertical extents of residual impacts to soil and groundwater identified in the Stantec (2020) Phase II ESA in areas of known contamination (e.g. railroad turntable and roundhouse) and focus on evaluating additional portions of the Site involved in the storage/handling/use/disposal of hazardous substances that have not been evaluated (such as bulk coal transloading/storage, petroleum storage, ship building, grain storage/elevator, and metal/scrap/junk yard areas).

3. Brownfield Site Definition

Site is real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or potential presence of hazardous constituents associated with previous Site operations. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and Appendix 1, the property targeted for this site-specific assessment is (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the U.S. government.

4 Enforcement or Other Actions

There are no known or anticipated environmental enforcement actions at the target property.

5 Property Specific Determination

The City of Manitowoc submitted a property-specific eligibility determination to USEPA on June 11, 2018 to facilitate completion of due diligence prior to the Community Development Authority of the City of Manitowoc acquiring the property for the purpose of blight elimination. The eligibility determination was approved by the City's USEPA program manager (Mr. Christopher Choi; USEPA Region 5) on June 28, 2018.

As USEPA has already approved a property-specific determination for the target Brownfield property, submittal of an additional property-specific determination associated with this grant application does not appear warranted. The following provides a summary of information provided previously in the Stantec (2018) eligibility determination supplemented with details of work recently completed at the Site.

(a) CERCLA Planned or Ongoing Removal Action: None currently under oversight by USEPA.

(b-i) Unilateral Administrative Order: No orders are known.

(b-ii) Court Order: No orders are known.

(b-iii) Administrative Order on Consent: No orders are known to exist.

(b-iv) Judicial Consent Decree: No orders are known.

(b-v) Permit issued under RCRA, FWPCA, TSCA, and SWDA: No permits or corrective actions are known.

(c) RCRA-Permitted facility on the Site subject to corrective action: No facilities are known.

(d) Properties that are land disposal units that have submitted a RCRA closure notification: No closure notifications are known.

(e) PCB Release Subject to Remediation Under TSCA: None known.

(f) Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

6.a Property Ownership Eligibility – Hazardous Substance Site

iii. Landowner protections from CERCLA Liability. A Phase I ESA was completed by Stantec (2019) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the current owner (The Community Development Authority of the City of Manitowoc) on March 21, 2019. The current owner acquired the property on April 12, 2019 for the purpose of blight elimination and secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. Since taking ownership, the CDA has maintained compliance with the required continuing obligations and no records have been identified indicating the Community Development Authority of the City of Manitowoc is considered potentially liable or known to be affiliated with any other person that is potentially liable for contamination at the Site.

6.a.i.(1) Bona Fide Prospective Purchaser Liability Protection

a. Information on Property Acquisition

- i. The Community Development Authority of the City of Manitowoc took ownership of the property from the previous owner (Wisconsin Central Ltd) on April 12, 2019 for the purpose of blight elimination.

- ii. Acquisition Date: April 12, 2019
 - iii. Prior Owner: Wisconsin Central, Ltd
 - iv. No records have been identified indicating the Community Development Authority of the City of Manitowoc was affiliated or related to prior owners or operators through familial, contractual, corporate, or financial relationships.
- b. Pre-Purchase Inquiry
 - i. A *Phase I ESA* was completed by Stantec (2019) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the current owner (The Community Development Authority of the City of Manitowoc) on March 21, 2019. The current owner acquired the property on April 12, 2019 for the purpose of blight elimination and secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. A Phase II ESA was completed pre- and post-acquisition (Stantec, 2020).
 - ii. The Stantec (2019) Phase I ESA was completed by registered Professional Engineers, Professional Geologists, and environmental professionals as defined and required per § 312.10 of 40 CFR 312.
 - iii. The Phase I ESA was completed on March 21, 2019 and ownership transfer occurred on April 12, 2019. Therefore, the Stantec (2019) Phase I ESA is considered valid for the purpose of establishing CERCLA liability defense.
- c. Timing and/or Contribution Toward Hazardous Substances Disposal. Disposal of all hazardous substances at the site occurred before the property was acquired by the Community Development Authority of the City of Manitowoc. The current owner has not caused or contributed to any release of hazardous substances at the site. Further, the current owner has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- d. Post-Purchase Uses. The Site has remained vacant since ownership was transferred to the Community Development Authority of the City of Manitowoc, except for a small wood-truss assembly operation on the northern portion of the Site. No sources of ongoing releases are known to remain on the Site. The CDA is in the process of inventorying and removing remaining de-minimis quantities of restricted wastes, demolishing/removing the remaining building slabs, and confirming/repairing engineered barriers.
- e. Continuing Obligations. The following provides a summary activities conducted after acquisition related to continuing obligations.
 - i. Stop continuing releases. As summarized in the Stantec (2020) Phase II ESA, a geophysical survey was conducted at the Site prior to the subsurface investigation. No anomalies consistent with underground storage tanks were identified and no aboveground storage tanks are apparent. Therefore, all potential sources of releases appear to have been removed prior to

acquisition of the Site by the grant applicant. As such, no sources of ongoing releases are known to remain on the Site. Therefore, the CDA has taken all reasonable steps to identify and stop continuing releases.

- ii. Prevent threatened future release. As noted above, all potential sources of releases appear to have been removed prior to acquisition of the Site by the grant applicant. As such, no sources of threatened future release are known to exist on the Site. The Site is secured and City police and building inspection staff drive by the Site during regular patrols to prevent illicit dumping. Therefore, the CDA has taken all reasonable steps to identify and prevent a threatened future release.
- iii. Prevent or limit exposure to previously released hazardous substances. The CDA is maintaining compliance with existing activity use limitations and institutional controls. The Site is secured and City police and building inspection staff drive by the Site during regular patrols to prevent illicit dumping. Therefore, the CDA has taken all reasonable steps to limit exposure to previously released hazardous substances.

The Community Development Authority of the City of Manitowoc will continue to (i) comply with all land-use restrictions and institutional controls; (ii) assist and cooperate with those performing the assessment and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

10/28/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

Choose State...

8. APPLICANT INFORMATION:

* a. Legal Name:

Community Development Authority of the City of Manitowoc, WI

* b. Employer/Taxpayer Identification Number (EIN/TIN):

39-1564326

* c. Organizational DUNS:

0804732450000

d. Address:

* Street1:

900 Quay Street

Street2:

* City:

Manitowoc

County/Parish:

* State:

WI: Wisconsin

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

54220-0000

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Adam

Middle Name:

* Last Name:

Tegen

Suffix:

Title:

Executive Director

Organizational Affiliation:

* Telephone Number:

920-686-6930

Fax Number:

* Email:

ategen@manitowoc.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-06

* Title:

FY21 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

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* 15. Descriptive Title of Applicant's Project:

Brownfield Site-Specific Assessment grant for Hazardous Substances for the River Point District located in Manitowoc, WI.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

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17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="200,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: